

AMANDA N. LISKAMM
Director, Consumer Protection Branch
MANU J. SEBASTIAN
Trial Attorney
U.S. Department of Justice
Consumer Protection Branch
450 Fifth Street, NW, Suite 6400S
Washington, D.C. 20001
Telephone: (202) 514-0515
Facsimile: (202) 514-8742
Email: Manu.J.Sebastian@usdoj.gov

E. MARTIN ESTRADA
United States Attorney
LINDSAY GREER DOTSON
Assistant United States Attorney
Chief, Criminal Division
VALERIE MAKAREWICZ (Cal. Bar No. 229637)
Assistant United States Attorney
Major Frauds Section
1100 United States Courthouse
312 North Spring Street
Los Angeles, California 90012
Telephone: (213) 894-0756
Facsimile: (213) 894-6269
E-mail: Valerie.Makarewicz@usdoj.gov

Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JASON EDWARD THOMAS CARDIFF,

Defendant.

No. 5:23-CR-00021-JGB

**OPPOSITION TO JASON CARDIFF'S EX
PARTE APPLICATION FOR A THIRD
ORDER EXTENDING INTERNATIONAL
TRAVEL OR AN ORDER MODIFYING BOND**

Plaintiff United States of America, by and through its counsel
of record, the Consumer Protection Branch of the United States
Department of Justice and Trial Attorney Manu J. Sebastian, and the
United States Attorney for the Central District of California and

1 Assistant United States Attorney Valerie L. Makarewicz, oppose the ex
2 parte application for an order extending international travel and
3 bond modification made by defendant, Jason Edward Thomas Cardiff, for
4 the same reasons as identified in its previous oppositions. [Dkt. #
5 13, 33, 89-90, 104, 123, 126, 129 and 150].

6 The government continues to question the veracity of the medical
7 records provided to the Court. Attorney Cochell, once again, over
8 government opposition, filed documentation under seal and in camera
9 without providing the government an opportunity to review the records
10 or verify their authenticity. See Exhibit 1, December 2024 Email
11 thread; see also Exhibit 2, January 2025 Email thread. The Court
12 currently has a one-sided viewpoint that does not permit the
13 government to respond. Without the ability to review the records, the
14 government is unable to assist the Court in determining the
15 appropriateness of the requested relief and formulate its position as
16 party to this action. The undersigned, as officers of the Court, have
17 the responsibility to advise the Court about the law as applied to
18 the facts and are unable to do so without the records. To date, other
19 than citing to a "constitutional" right to privacy, Defendant has
20 failed to allege proper grounds for withholding the documentation
21 from the government. If needed, the Court may issue a protective
22 order to assuage Defendant's concerns if valid.

23 Importantly, Defendant, in his interview with pretrial services
24 on November 30, 2023, reported that he had no physical or mental
25 health issues. See Dkt. 90, Ex. 3. Now, Defendant claims to have had
26 a sudden emergency medical issue related to "symptoms and condition
27 [that] predate the charges in this case." Dkt. 162 at 3. This
28 previously unreported alleged long-standing condition was purportedly

1 exasperated shortly after he was permitted to travel to Ireland to
2 assist his wife who allegedly also had a sudden similar emergency
3 medical issue a few weeks prior, making Defendant "unfit to fly."¹
4 Id. at 2.

5 As detailed in the government's previous filings, Defendant has
6 a proven history of deception and dishonesty. See Dkt. 13, 61, 65,
7 89-90. This deception and dishonesty includes the falsification of
8 bank records, altered merchant processing applications, and false
9 statements on applications related to the sale of futures
10 receivables. Dkt. 45, Ex. 45; see Dkt. 65; see also FTC v. Jason
11 Cardiff, et al. Case No. 5:18-cv-02104, Dkt. 7. For example, on July
12 6, 2020, the Receiver in Defendant's civil case filed a report
13 illustrating to the court that Defendant had altered bank statements
14 and submitted these fraudulent records to support a real estate
15 transaction. Dkt. 45, Ex. 45. In his most recent filing, Defendant
16 deceptively claims that he "has consistently complied with all court
17 orders." Dkt. 162 at 4. USPO Ryan McClellan, however, reports that to
18 date Defendant has only made one video check-in call even though he
19 has been ordered to make such video calls every other day since
20 November 20, 2024. See Exhibit 3, Email from USPO Ryan McClellan.
21 Defendant has violated the conditions of the November 20, 2024 order
22 and the December 11, 2024 order.

23 Because of this deception and dishonesty, the government
24 requests the Court provide the government with the ability to review
25 the report and underlying medical records, and, if the Court is
26

27 ¹ It appears that medical professionals have not prohibited
28 Defendant from using an alternate mode of transportation to return to
the United States.

1 considering granting another extension of the time Cardiff is
2 permitted to remain in Ireland, schedule a hearing for argument on
3 the matter.

4 The government also continues to oppose any bond modification
5 because Defendant is a flight risk and has failed to meet the limited
6 bond conditions the Court has imposed. After being granted leniency
7 by this Court and then failing to meet this requirement, Defendant
8 now seeks to forego the regular video verification with USPO. The
9 consistent video check-ins verifying his location are the only tool
10 that provides some assurance that Defendant has not fled Ireland.
11 Defendant's non-compliance with this condition should not result in
12 the removal of the condition. Any further bond modification provides
13 Defendant with additional opportunity to flee and obscure his trail
14 so that law enforcement cannot find him.

15 Accordingly, the government requests the Court allow the
16 government to verify the authenticity of the medical documentation,
17 deny the defendant's ex parte application for a third order extending
18 international travel, and deny any bond modification.

19 Dated: January 15, 2025

Respectfully submitted,

20 AMANDA N. LISKAMM
21 Director
22 Consumer Protection Branch

23 E. MARTIN ESTRADA
United States Attorney

24 /s/
25 MANU J. SEBASTIAN
Trial Attorney
26 VALERIE L. MAKAREWICZ
Assistant United States Attorney

27 Attorneys for the Plaintiff
28 United States of America